

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division

|                                  |   |                            |
|----------------------------------|---|----------------------------|
| SNC-LAVALIN CONSTRUCTORS, INC.,  | ) |                            |
|                                  | ) |                            |
| Plaintiff,                       | ) |                            |
|                                  | ) | Case No. 8:19-cv-00873-GJH |
| v.                               | ) |                            |
|                                  | ) |                            |
| TOKIO MARINE KILN INSURANCE L,   | ) |                            |
| LIMITED,                         | ) |                            |
|                                  | ) |                            |
| Defendant.                       | ) |                            |
| <hr/>                            |   |                            |
| SNC-LAVALIN CONSTRUCTORS, INC.,  | ) |                            |
|                                  | ) |                            |
| Plaintiff,                       | ) |                            |
|                                  | ) | Case No. 8:19-cv-01510-GJH |
| v.                               | ) |                            |
|                                  | ) |                            |
| CERTAIN UNDERWRITERS AT LLOYD'S, | ) | Hon. George J. Hazel       |
| <i>et al.</i> ,                  | ) |                            |
|                                  | ) |                            |
| Defendants.                      | ) |                            |
| <hr/>                            |   |                            |

**DECLARATION OF PHILIP SANDERS**

I, Philip Sanders, do hereby swear and affirm as follows:

1. I am over the age of 18 years, and I am competent to testify based upon my personal knowledge as to the matters stated herein.

2. I am a Non-Marine Senior Claims Adjuster employed by Talbot Underwriting Services Ltd. ("TUSL"). TUSL employs personnel who provide their services to Talbot Underwriting Ltd ("TUL").

3. I make this declaration based on my own knowledge, some of which has been ascertained from the business records generated and maintained by TUL in its ordinary course of business. I submit this declaration in support of Defendants' Opposition to

Plaintiff's Motion to Remand. If called to testify, I could and would competently testify to the matters stated herein.

4. In my capacity as a Senior Claims Adjuster employed by TUSL, I have personal knowledge of the Construction Erection All Risks Insurance Policy, Policy No. P15UC02310, issued to Public Service Enterprise Group regarding the construction of the PSEG Keys Energy Center, a 755 MW combined cycle natural gas fired facility located at North Keys Road, Brandywine, Maryland (the "Policy").

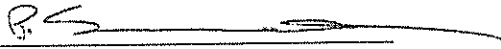
5. One of the underwriters severally subscribing to the Policy is Lloyd's Syndicate No. 1183 ("Syndicate 1183"). Attached hereto as Exhibit 1 is a true and accurate copy of Syndicate 1183's Risk Details / Slip for the Policy, number UMR:B0507P15UC02310 (without contract endorsements).

6. Syndicate 1183's managing agent for the 2015 year of account is TUL. Talbot 2002 Underwriting Capital Ltd ("T2002") is the sole member of Syndicate 1183 for that year of account. Syndicate 1183 has no members other than T2002 for that year of account.

7. T2002, TUSL and TUL are each private limited companies incorporated in England and Wales, with registered offices in London, England.

I SOLEMNLY AFFIRM AND DECLARE under the penalties of perjury under the laws of the United States of America that the contents of the foregoing paper are true and correct.

Dated: 5 March 2021

Signature:   
Philip Sanders  
Non-Marine Senior Claims  
Adjuster  
For and on behalf of Talbot  
Underwriting Ltd., as Managing  
Agent of Syndicate 1183  
60 Threadneedle Street  
London, EC2R 8HP, England